

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

<b>WSOU INVESTMENTS, LLC D/B/A</b>	§	
<b>BRAZOS LICENSING AND</b>	§	<b>Case No. 6:20-cv-00952-ADA</b>
<b>DEVELOPMENT,</b>	§	<b>Case No. 6:20-cv-00953-ADA</b>
<i>Plaintiff,</i>	§	<b>Case No. 6:20-cv-00956-ADA</b>
	§	<b>Case No. 6:20-cv-00957-ADA</b>
<b>v.</b>	§	<b>Case No. 6:20-cv-00958-ADA</b>
	§	
<b>ONEPLUS TECHNOLOGY</b>	§	<b>JURY TRIAL DEMANDED</b>
<b>(SHENZHEN) CO., LTD.,</b>	§	
<i>Defendant.</i>	§	

**JOINT CASE READINESS STATUS REPORT**

**TO THE HONORABLE COURT:**

Plaintiff WSOU Investments, LLC d/b/a Brazos Licensing and Development (“WSOU”) and Defendant OnePlus Technology (Shenzhen) Co., Ltd. (“OnePlus”) hereby provide the following status report in advance of the initial Case Management Conference (CMC).

**FILINGS AND EXTENSIONS**

Plaintiff WSOU filed a complaint in each of the above-numbered cases on October 14, 2020. There has been one extension for a total of 30 days.

**RESPONSES TO THE COMPLAINTS**

In lieu of answering Plaintiff WSOU’s five Complaints, on February 26, 2021, Defendant OnePlus moved to dismiss for insufficient service of process and lack of personal jurisdiction pursuant to Rules 12(b)(2) and (5) in each of the above-numbered cases. *See* Case No. 6:20-cv-00952, Dkt. 21; Case No. 6:20-cv-00953, Dkt. 20; Case No. 6:20-cv-00956, Dkt. 20; Case No. 6:20-cv-00957, Dkt. 20; Case No. 6:20-cv-00958, Dkt. 20.

**PENDING MOTIONS**

On February 26, 2021, in each of the above-numbered cases, Defendant OnePlus filed a motion to dismiss for insufficient service of process and lack of personal jurisdiction pursuant to Rules 12(b)(2) and (5). *See* Case No. 6:20-cv-00952, Dkt. 21; Case No. 6:20-cv-00953, Dkt. 20; Case No. 6:20-cv-00956, Dkt. 20; Case No. 6:20-cv-00957, Dkt. 20; Case No. 6:20-cv-00958, Dkt. 20.

#### **RELATED CASES IN THIS JUDICIAL DISTRICT**

The above-numbered cases were all filed by Plaintiff WSOU against Defendant OnePlus in this District. There are no known related cases.

#### **IPR, CBM, AND OTHER PGR FILINGS**

There are no known IPR, CBM, or other PGR filings with respect to the patents asserted in the above-numbered cases.

#### **NUMBER OF ASSERTED PATENTS AND CLAIMS**

Plaintiff WSOU has asserted one patent in each case. Plaintiff WSOU has not yet identified the number of asserted claims, although it asserted one claim in each Complaint. Plaintiff WSOU has not yet served its preliminary infringement contentions.

#### **APPOINTMENT OF TECHNICAL ADVISOR**

The parties request a technical adviser to be appointed to the case to assist the Court with claim construction or other technical issues.

#### **MEET AND CONFER STATUS**

Plaintiff WSOU and Defendant OnePlus conducted a meet & confer conference for the above-numbered cases on March 5, 2021.

The parties raise the following pre-*Markman* issues:

**Protective Order.** The parties anticipate submitting a proposed form of protective/confidentiality order, or their limited disputes regarding such an order, in the coming weeks.

***Deferral of Entry of a General Scheduling Order.***

**Defendant's Position:** In light of the pending dispositive motion regarding improper service and the resulting lack of personal jurisdiction, Defendant OnePlus submits that the Court should defer entry of a general scheduling order in the five cases until the motion to dismiss is decided.

**Plaintiff's Position:** Plaintiff WSOU disagrees with Defendant OnePlus's request for deferral. Plaintiff WSOU will timely submit its oppositions to Defendant OnePlus's motions on Friday, March 12, 2021, explaining why Defendant OnePlus's motions should be denied.

The parties currently have no other pre-*Markman* issues for discussion at the CMC.

Date: March 9, 2021

Respectfully submitted,

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